

**THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

**IN RE:** :  
**ISHOP A JETER** : **BK. No. 19-10390 MDC**  
: **Debtor** :  
: **Chapter No. 13**  
**PINGORA LOAN SERVICING, LLC**  
**Movant**  
**v.**  
**ISHOP A JETER**  
**DENISE HOLT-JETER (Non-Filing Co-Debtor)** **11 U.S.C. §362 and §1301**  
**Respondents**

**CREDITOR'S DECLARATION OF DEBTOR'S REQUEST FOR TEMPORARY  
FORBEARANCE DUE TO THE COVID-19 EMERGENCY**

Now comes Creditor, **PINGORA LOAN SERVICING, LLC** ("Creditor"), by and through undersigned counsel, and hereby submits this Declaration to the Court as notice that due to a recent financial hardship resulting directly or indirectly from the COVID-19 emergency, the Debtor(s) has requested – and Creditor has provided – a temporary suspension of mortgage payments.

The Debtor(s) recently contacted Creditor requesting a forbearance period of 6 months which allows Debtor(s) to elect to not tender mortgage payments to Creditor that would come due on the mortgage starting April 1, 2020 through September 1, 2020. During this forbearance period, all terms and provisions of the mortgage note and security instrument, other than the payment obligations, will remain in full force and effect unless otherwise adjusted by this court or through a loan modification.

Per the request, Debtor(s) will resume Mortgage payments beginning October 1, 2020 and will be required to cure the delinquency created by the forbearance period. During the forbearance period and up to and including the time when that period ends, Creditor will work with the Debtor(s), the Debtor(s)' attorney (if applicable) and the bankruptcy trustee on how to address the

suspended payments in the long-term, including obtaining any necessary court consent and approval. This Declaration does not constitute an amendment or modification to the Debtor(s)' plan of reorganization, and does not relieve the Debtor(s) of the responsibility to amend or modify the plan or reorganization to reflect the forbearance agreement, if required.

Creditor does not waive its rights to seek relief from the automatic stay for other reasons other than non-payment of the Mortgage, including, but not limited to, a lapse in insurance coverage or payment of property taxes.

Prior to the expiration of the forbearance period the debtor(s) must take affirmative steps to address the status of the mortgage account by: (a) bringing the account post-petition current; (b) extend the forbearance period; (c) apply for loss mitigation; or (d) amend their Chapter 13 Plan.

Creditor, does not waive any rights to collect the payments that come due prior to or during the forbearance period.

Creditor does not waive its rights under the terms of the note and mortgage or other applicable non-bankruptcy laws and regulations, including, but not limited to, RESPA, and the right to collect on any post-petition escrow shortage.

Creditor may continue to file notices in compliance with Fed. Rule Bankr. P. 3002.1

/s/ Thomas Song, Esquire

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May 11, 2020

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**CERTIFICATE OF SERVICE**

I hereby certify that service upon all interested parties, indicated below was made by sending true and correct copies of the Notice of Forbearance by electronic means on May 11, 2020.

WILLIAM C. MILLER, ESQUIRE (TRUSTEE)  
P.O. BOX 1229  
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722 DERWYN ROAD  
DREXEL HILL, PA 19026-1505

DAVID M.OFFEN, ESQUIRE  
601 WALNUT STREET, SUITE 160 WEST  
PHILADELPHIA, PA 19106

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DREXEL HILL, PA 19026-1505

UNITED STATES TRUSTEE  
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200 CHESTNUT STREET, SUITE 502  
PHILADELPHIA, PA 19106

/s/ Thomas Song, Esquire

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